

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 45, 157, 196, 200, 327, 362, 407 & 408

**CERTIFICATION OF COUNSEL**

I, Matthew R. Pierce, counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On November 19, 2022, the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals and (III) Granting Certain Related Relief* [D.I. 45] (the “Motion”).

2. On November 23, 2022, the Court entered the *Interim Order (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals on an Interim Basis and (III) Granting Certain Related Relief* [D.I. 157].

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

3. On December 9, 2022, Bloomberg L.P., Dow Jones & Company, Inc., The New York Times Company, and The Financial Times Ltd. (collectively, the “Media Intervenors”) filed the *Expedited Motion of Bloomberg L.P., Dow Jones & Company, Inc., the New York Times Company and the Financial Times Ltd. to Intervene for the Limited Purpose of Objecting to the Motion of Debtors for Entry of a Final Order Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals* [D.I. 196] (the “Media Intervenors’ Objection”).

4. On December 12, 2022, the United States Trustee (the “U.S. Trustee”) filed the *United States Trustee’s Objection to the Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals and (III) Granting Certain Related Relief* [D.I. 200] (the “U.S. Trustee Objection”).

5. On December 28, 2022, the Ad Hoc Committee of Non-US Customers of FTX.com filed the *Joinder of the Ad Hoc Committee of Non-US Customers of FTX.com in Connection with the Motion of the Debtors for Entry of Interim and Final Orders Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers* [D.I. 327].

6. On January 4, 2023, the U.S. Trustee filed the *Supplement to United States Trustee’s Objection to the Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals and (III) Granting*

*Certain Related Relief* [D.I. 362] (the “U.S. Trustee Supplement”, together with the U.S. Trustee Objection, the Media Intervenors’ Objection, the “Objections”).

7. On January 8, 2023, the Official Committee of Unsecured Creditors (the “Committee”) filed the *Joinder of Official Committee of Unsecured Creditors to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals and (III) Granting Certain Related Relief* [D.I. 408].

8. On January 8, 2023, the Debtors filed the *Debtors’ Reply in Support of Motion for Entry of an Order Authorizing Debtors to Redact or Withhold Certain Confidential Information* [D.I. 407], attaching as Exhibit 1 thereto a revised proposed form of order (the “Revised Order”).

9. On January 11, 2023, the Court held a hearing (the “Hearing”) to consider, among other things, the Motion.

10. The Debtors have further revised the Revised Order (the “Proposed Order”) consistent with the Court’s ruling on the Motion at the Hearing, a copy of which is attached hereto as **Exhibit A**. A copy of the Proposed Order compared against the Revised Order is attached hereto as **Exhibit B**. The Proposed Order has been circulated to the U.S. Trustee, the Committee and the Media Intervenors. The Committee does not object to entry of the Proposed Order. The U.S. Trustee and the Media Intervenors have reviewed the Proposed Order and attachments thereto and believe the Proposed Order accurately reflects the Court’s ruling on the Motion at the Hearing. In accordance with the Court’s electronic order processing procedures, a clean copy of the Proposed Order shall be uploaded to CM/ECF.

11. Accordingly, the Debtors respectfully request that the Court enter the Proposed Order at its earliest convenience.

Dated: January 19, 2023  
Wilmington, Delaware

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*Proposed Counsel for the Debtors  
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